REMARKS/ARGUMENTS

Pending claims 1, 3-7, 11, 13-17, 21 and 23-24 stand rejected under 35 U.S.C. §103(a) over U.S. Patent No. 5,157,905 (Powell) and further in view of U.S. Patent No. 6,718,519 (Taieb). Applicant respectfully traverses the rejection.

As to claim 1, nowhere does Powell teach or suggest converting characters to a first code format having a double-byte length if the characters of a first type and converting characters to a second code format having a multiple double-byte length if the characters are of a second type. This is so, for at least two reasons. First, Powell does not perform "converting" as contended by the Office Action. Instead, Powell merely discloses that document representations are "characterized" or "mapped" to target values. Powell, col. 11, ln. 59 – col. 12, ln. 18. These characterizations are not conversions, as the original document representation still exists in its original form. In contrast the claimed characters are converted into a different format, not merely mapped. Second, the characterizations generated by Powell nowhere convert characters to code formats of different byte lengths depending on a type of character. For at least these reasons, claim 1 and the claims depending therefrom are patentable over the proposed combination.

Further, there is no motivation to combine Powell and Taieb. In this regard, Powell is directed to statistical text analysis (Powell, col. 1, lns. 5-10). In contrast, Taieb is directed to displaying multiple language documents. The mapping of characters into 2D or 3D characterizations done in Powell is merely to determine a language in which the document was created. *E.g.*, Powell, col. 11, lns. 62-67. Powell teaches no other use for these 2D and 3D characterizations. Taieb, on the other hand, is directed to displaying multilingual texts. However, Taieb nowhere teaches or suggests use of conversion of characters to different code formats based on a type of the character.

The combining of Powell and Taieb proposed by the Office Action would make no sense, and would not meet the recited subject matter of claim 1. That is, even if the 2D and 3D characterizations generated in Powell were displayed using the teaching of Taieb, no display of characters would result as recited by claim 1. Instead, a statistical 2D or 3D characterization would appear—not characters.

Nor is there any teaching or suggestion in either reference to combine them. Accordingly, a *prima facie* case of obviousness has not been established. MPEP §2142; 2143.

Furthermore, the proposed combination would render the prior art unsatisfactory for its intended purpose. Accordingly, no suggestion or motivation can exist to make the proposed modification. MPEP 2143.01. In this regard, displaying the 2D and 3D characterizations of Powell based on the teaching in Taieb would frustrate the intended purpose of Powell, namely to perform statistical analysis to identify a language and character set. There is absolutely no reason to display the characterizations in the system of Powell. Even if displayed, the characterizations would not cause the display of the characters of the file as recited by the claims. Accordingly, for all these reasons claims 1, 3-7, 11, 13-17, 21, and 23-25 are patentable over the proposed combination.

Pending claims 2, 12 and 22 stand rejected under 35 U.S.C. §103(a) over Powell in view of Taieb and in further view of U.S. Patent No. 6,397,259 (Lincke). Applicant respectfully traverses the rejection.

As to claim 2, the Office Action concedes that neither of Powell or Taieb teaches or suggests receiving of a web page in a plane, row, and column format. Office Action, p. 6. Nor does Lincke, contended by the Office Action to meet this claim. *Id.* Instead, Lincke merely teaches that HTML documents include tags and attributes that are associated with text, tables and forms. Lincke, col. 21, ln. 65 – col. 22, ln. 10. However, nowhere does this or any other portion of Lincke teach or suggest that a web page is in a plane, row and column format. For these further reasons, claims 2, 12 and 22 are further patentable.

New dependent claims 26-32 are patentable, at least for the same reasons discussed above regarding the independent claims from which they depend.

The application is believed to be in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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